COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Ford Motor Company
Norfolk, Virginia
Permit No. TRO60268

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Ford Motor Company has applied for a Title V Operating Permit for its Norfolk Truck Assembly facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: March 22, 2007.

Air Permit Manager: Date: March 22, 2007.

_____ _____

Regional Director: Date: March 22, 2007.

_____ _____

FACILITY INFORMATION

Permittee
Ford Motor Company
2424 Ford Drive
Norfolk, Virginia

Facility Name

Norfolk Assembly Plant
Ford Motor Company
2424 Ford Drive
Norfolk, Virginia 23523

AIRS ID No. 51-710-00009

SOURCE DESCRIPTION

SIC Code: 3711, NAICS 336112 – Final assembly and finishing of Motor Vehicles and Car Bodies

Facility Description: The plant assembles automotive trucks from manufactured parts. The main process steps are body assembly, painting, final assembly and miscellaneous production support. There are no alternative operating scenarios associated with this application. The new painting facility was brought on-line during calendar year 1991 and was permitted at that time with a calculated baseline VOC emission level of 1183 tons per year. During the past fifteen years, some minor changes to the plant were made to improve the quality of the finished product. The permitted emission level for VOC's has increased as production changes are made to adjust the jobs per hour through the plant. As the coating process has been refined over the model years, improved coating materials have allowed for reduced usage per vehicle and higher efficiencies in solids transfer. Through the continued application of sound engineering design changes and new coating technology, Ford has managed to incrementally ratchet-up truck production, over the years, without any significant increase in coating throughputs or the resulting VOC emissions.

New Source Performance Standard, Subpart MM - The Norfolk Assembly Plant is subject to the NSPS, Subpart MM; Standards of Performance for Automobile and Light Truck Coating Operations. The requirements of this New Source Performance Standard deal primarily with VOC content of coatings by class, transfer efficiencies of solids and the destruction efficiency of the control device. Compliance with the NSPS is checked by use of performance tests in the form of equations. Two of the monthly calculations that are required at the plant are (1.) monthly Kg of VOC per liter of applied solids and (2.) monthly Kg of VOC per liter of applied solids emitted after the incinerator.

National Emission Standards for Hazardous Air Pollutants; NESHAP Subpart IIII – The MACT for "Surface Coating of Automobiles and Light-Duty Trucks" specifies a compliance date for existing sources as April 26, 2007. The MACT offers several options for showing compliance with the regulation. The Ford facility must select which compliance option will be used at the Norfolk Assembly Plant and then provide written records and reports that show all affected emission units at the plant are and have been in recent compliance by the compliance date.

The Ford plant has emission units that are uncontrolled with respect to the VOC emissions and several previously modified units that are controlled by a 'Carbon wheel' process. The Carbon wheel concentrates the emissions from several units and allows the capture of VOC's from booths that have low concentrations of solvents. This approach also enables the RTO's to be sized much smaller as they are only required to handle the purge flow from the carbon panels and not the much larger flow of booth air. Product quality improvement projects over the last ten years involved replacement of manual spraying units with robot controlled spray and bell sprayers. Eliminating the human element from some of the booths allows for adjustment of the required airflow for that booth section, which leads to, improved product quality and better capture of emissions. The Title V permit is based on the NSR permit issued February 12, 1999 which incorporated several changes in the coating allocations, process by process, and allowed for a small increase in permitted emissions.

Compliance Assurance Monitoring Analysis – The three primary criteria that determine which emission units at a major source could be subject to the Rule are as follows:

[64.2a.1.] – The unit is subject to an emission limitation (permit limit) or a pollutant standard;

[64.2a.2.] – The emission limitation or pollutant standard is achieved by using an add-on control device which targets the subject pollutant, and;

[64.2a.3.] – The pre-control emissions of the target pollutant are 100% of the amount, in tons per year, which designates the source as being major for that pollutant.

Exemptions: Ford gets a blanket exemption at the Norfolk Assembly plant for VOC/VOHAPs due to the promulgation of the MACT after November 15, 1990. Therefore the VOC emission units at the plant will not be subject to CAM and no analysis is necessary. The only remaining pollutant with an emission limitation or a pollutant standard would be particulate.

Uncontrolled particulate emissions are at major levels for the Ford plant, but are divided among many booth sections. The paint spray booths control most of the particulate with water wall scrubbers which are represented as an integral part of each booth. However, Ford has not supplied any documentation that leads to a clear determination that the scrubbers are NOT add-on control devices. Add-on controls, then, consist of the scrubbers, baghouses and panel filters which capture the remaining particulate and PM10. There are no calculations available for the individual paint spray booth sections, which are needed to make the CAM determination. Therefore CAM will be applied to all booth sections.

The facility is a Title V major source of Volatile Organic Compounds and HAP's. This source is located in a marginal non-attainment area for ozone, and is a major source. The facility was previously permitted under a Major NSR Permit, issued on December 11, 1991, and amended on December 2, 1993, June 30, 1994 and February 12, 1999.

COMPLIANCE STATUS

The facility was last inspected on March 23, 2006. The inspection indicated that the facility was out of compliance because of a late report, but in compliance with all regulations and the permit conditions. Ford is subject to the NSPS for Automobile and Light Truck Coating Facilities, Subpart MM. Compliance with this requirement involves the calculation of coating transfer efficiencies in the paint booths and requires monthly calculations and recordkeeping. Ford has a previously established baseline for VOC emissions of 1183 tons per year (prior to 1991 and the new painting facility). There have been several permit amendments, mostly to adjust the VOC emission levels from one area to another and/or to evaluate a booth area for BACT. This facility is not limited by production of finished vehicles, but only by the resulting emissions from the coating

by the resulting emissions from the coating and sealing processes.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission ID	Stack	Emission Unit Description	Size/Rated Cap	Pollution Control D (PCD) Descripti	PCD I	Pollutar Controlle	Applicable N Permit Dat
Fuel Burning Equipment							
PR1	PR	Natural gas Wa Heater	29.3 mmBtu Hour	N/A	N/A	N/A	N/A
PR2	PR	Natural gas Wa Heater	29.3 mmBtu Hour	N/A	N/A	N/A	N/A
EC2	EC2 --	Natural gas fired	28 mmBtu per	N/A	N/A	N/A	N/A
PS2	PS2	Natural gas fired	24 mmBtu per	N/A	N/A	N/A	N/A
PS3	PS3	Natural gas fired heater	80 mmBtu per	N/A	N/A	N/A	N/A
PS5	PS5	Natural gas fired heater	20 mmBtu per	N/A	N/A	N/A	N/A
ME2	ME2 --	Natural gas fired	16 mmBtu per	N/A	N/A	N/A	N/A
ME3	ME	Natural gas fired heater	97 mmBtu per	N/A	N/A	N/A	N/A
ME5	ME	Natural gas fired heater	18 mmBtu per	N/A	N/A	N/A	N/A
TT2	TT2 --	Natural gas fired	16 mmBtu per	N/A	N/A	N/A	N/A
TT3	TT3	Natural gas fired heater	54 mmBtu per	N/A	N/A	N/A	N/A
RTO1	RTO1	Regenerative the oxidizer	16 mmBtu per	Controls VOC	RTO1	VOC & H	2/12/99
RTO2	RTO	Regenerative the oxidizer	32 mmBtu per	Controls VOC	RTO2	VOC & H	2/12/99

Process A – Truck Assembly Operations							
Emission ID	Stack	Emission Unit Description	Size/Rated Cap	Pollution Control D (PCD) Descripti	PCD I	Pollutar Controlle	Applicable Per Date
BS1	N/A	Body Shop Seal	380,000 gallon	N/A fugitive	N/A	N/A	2/12/99
PR1	PR1	Phosphate hot w	29.3 mmBtu hour	N/A	N/A	N/A	N/A
PR2	PR1	Phosphate hot w	30 mmBtu per	N/A	N/A	N/A	N/A
SA1	SA1 --	Sealer applicati	2.0 tons of VOC/Yea	N/A	N/A	N/A	2/12/99
EC1	EC1 --1	E-coat dip tank	55 vehicles per	Water-based coa	ECT	VOC bas	2/12/99

	1,2,3		per hour	coating		based solv	
Emission ID	Stack	Emission Unit Description	Size/Rated Cap	Pollution Control D (PCD) Descripti	PCD I	Pollutar Controlle	Applicable Pe Date
EC2	EC2 --1	E-coat oven	28 mmBtu per	N/A	N/A		2/12/99
EC3	EC3	E-coat scuff boo	55 vehicles per	Panel filters	ECSF	Particulate PM10	2/12/99
PS1	PS1--1 -	Guidecoat (prin spray booth – sp application	55 vehicles per	Water wall scrub	PSCR	Particulate PM10	2/12/99
PS1	PS1, Zo	Guidecoat (prin spray booth	55 vehicles per	Carbon wheel a RTO for Zone	RTO1	VOC's ar HAP's	2/12/99
PS2	PS2--2	Guidecoat (prin oven	24 mmBtu per	RTO	RTO2	VOC's ar HAP's	2/12/99
PS3	PS3	Guidecoat (prime supply house	80 mmBtu per	Bag filters	ASH – 5	PM10	2/12/99
PS4	PS4	Guidecoat (prin scuff booth	55 vehicles per	Panel filters	PSF	Particulate PM10	2/12/99
PS5	PS5	E-coat, Guidecoat booth air supply h	20 mmBtu per	N/A	N/A	N/A	2/12/99
ME1	ME1--1	Topcoat spray bo	55 vehicles per	Water wall scrub and filter hous	TCSFI	Particulate PM10	2/12/99
ME1	ME1, Z 3,4,5,	Topcoat spray bo	55 vehicles per	Carbon wheel a RTO for Zones 3, 4	RTO2	VOC's ar HAP's	2/12/99
ME2	ME2--1	Topcoat over	16 mmBtu per	RTO	RTO2	VOC's ar HAP's	2/12/99
ME3	ME3	Topcoat air sup house	97 mmBtu per	Bag filters	ASH – 5	PM10	2/12/99
ME4	ME4	Topcoat touchup/scuff bo	55 vehicles per	Bag filters and pa filters	TCTU	Particulate PM10	2/12/99
ME5	ME5	Topcoat/Tutone booth air supply h	18 mmBtu per	Bag filters	ASH – 5	PM10	2/12/99
TT1	TT1–1 -	Tutone/repair sp booth	55 vehicles per	Water wall scrub	TTSCR	Particulate PM10	2/12/99
TT2	TT2--1	Tutone/repair o	16 mmBtu per	RTO	RTO1	VOC's a	2/12/99

						HAP's	

TT3	TT3	Tutone/repair supply house	54 mmBtu per	N/A	N/A	N/A	2/12/99
TT4	TT4	Tutone/repai touchup/scuff b	55 vehicles per	Panel filters	TTREF	Particulate PM10	2/12/99
WA1	WA1	Windshield installation	55 vehicles per	N/A	N/A	N/A	2/12/99
FR1	FR1 -1	Final repair boo	6.4 tons of VOC year	N/A	N/A	N/A	2/12/99
SV1	N/A	Purge, cleaning body wipe	180.5 tons of V per year	N/A	N/A	N/A	2/12/99

The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement

EMISSIONS INVENTORY

A copy of the 2005 annual emission update is attached as Attachment A. The facility provided, as requested, an estimate of their actual emissions for the operating year of 2005. The actual emissions are summarized in the following tables.

2005 Actual Emissions

Criteria Pollutant Emissions in Tons per Year					
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
Assembly Pla	589.14	32.05	0.23	22.78	38.13
Facility Tota	589.14	32.05	0.23	22.78	38.13

2005 Facility Hazardous Air Pollutant Emissions (trace pollutants which result in annual emissions of less than 0.5 Tons are not listed)

Pollutant	Hazardous Air Pollutant Emissions
Various, Glycol Ethers	106 Tons per Year
100-41-4, Ethylbenzene	51 Tons per Year
108-88-3, Toluene	99 Tons per Year
1330-20-7, Xylene	215 Tons per Year
67-56-1, Methyl Alcohol	21 Tons per Year
78-93-3, Methyl Ethyl Ketone*	76 Tons per Year
108-10-1, Methyl Isobutyl Ketone	37 Tons per Year
TOTAL HAPS	589 Tons per Year

* MEK has been delisted as a HAP, but remains on the State Toxics List.

EMISSION UNIT APPLICABLE REQUIREMENTS – (emission units ID# PR1, PR2, EC2, PS2, PS3, PS5, ME2, ME3, ME5, TT2, TT3, RTO1 and RTO2)

Limitations
The Ford paint facility was permitted December 11, 1991 and has permit amendments dated December 2, 1993, June 30, 1994 and February 12, 1999. The following limitations are applied to the fuel burning equipment, as installed in the present operation:

There are no limitations applied to the fuel burning equipment in the current permit. However, the following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

< 9 VAC 5-40-900 "Existing Source Standard for Particulate Emissions" provides an emission limit based on the heat input max capacity of the combustion device.

< 9 VAC 5-40-930 "Existing Source Standard for Sulfur Dioxide" provides an emission limit based on the heat input max capacity of the combustion device.

< 9 VAC 5-50-80 "New/Modified Source Standard for Visible Emissions" - units may not emit greater than 20% opacity except for one six-minute period in any one hour of not more than 30% opacity (ref. 40 CFR 60, Appendix A. Method 9).

< 9 VAC 5-50-20 "Facility and Control Equipment Maintenance or Malfunction" – at all times, facility, including associated air pollution control equipment, must be maintained and operated in a manner consistent with air pollution control practices for minimizing emissions.

Periodic Monitoring
The last permit amendment of February 12, 1999 does not list any emissions limits for the fuel burning equipment or any fuel throughputs either. However, standards for particulate and sulfur dioxide, plus monitoring for opacity have been applied to the boiler in conditions III.A.1, III.A.2 and III.B. Without any fuel throughput limits or corresponding calculated emission limits for criteria pollutants, we are left with the particulate, visible emissions and sulfur dioxide standards for fuel burning equipment that apply to this emissions unit.

Demonstration of Expected Emissions from the Aggregated Natural Gas burning equipment:

< AP-42 lists the Natural gas emission factor as 1.9 lbs-PM per 10^6 cubic feet of gas.
< MAX heat input = 461 mmBtu/hour x 1 CF/1050 Btu = **439,050 SCF/hour maximum**.
< MAX PM emissions = 1.9-lbs/10^6 scf x 439,050 scf/hour = <u>0.834 lbs-PM/hour</u>
< 0.834 lbs is less than the standard of 5.9 lbs-PM per hour in condition III.A.1.

< AP-42 lists the Natural gas emission factor as 0.6-lbs SO_2 per 10^6 cubic feet of gas.
< MAX SO_2 emissions = 0.6 lbs/10^6 scf x 439,050 scf/hour. = <u>0.26 lbs-SO_2 /hour</u>
< 0.26 lbs/hour is less than the standard of 25.9 lbs/hour in condition III.A.2.
< No owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one, six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the

this section because of the presence of water vapor shall not be a violation of this section. (9 VAC 5-50-80).

Recordkeeping
The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include a logbook for recording any abnormal opacity observations, any Method 9 VEE required and corrective action taken to restore normal operations. Additional records are required to establish the fuel types to be burned in the fuel burning equipment. Other records include the listing of the DEQ-approved pollutant-specific emission factors for the criteria pollutants emitted from the fuel burning equipment along with calculations of these emissions.

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting
The permit requires quarterly reporting for the total mass of VOCs from the primecoat, guidecoat and topcoat operations based on Ford's past records response. The requirement for negative reports has not been met previously when the frequency was every six-months for these reports, and therefore compliance has stepped-up the frequency of the reporting to every three months. Also the 'Annual Compliance Certification' the source must submit by March 1st for each calendar year per Condition VII.D.

Streamlined Requirements
The permit section for the fuel burning equipment does not contain any streamlining of permit requirements.

EMISSION UNIT APPLICABLE REQUIREMENTS – (emission unit ID# BS1, PR1, PR2, SA1, EC1, EC2, PS1, PS2, PS3, PS4, PS5, ME1, ME2, ME3, ME4, ME5, TT1, TT2, TT3, TT4, WA1, FR1 and SV1)

Limitations
The following limitations are derived from the NSR permit issued February 12, 1999.

Particulate emissions from all sections of the Prime, Main Enamel and Tutone/Repair paint spray booths controlled by water wash scrubbers. Bag filters on Prime Bell (PS3), Main Enamel Basecoat Bell (ME3), Reciprocator (ME4), Robot (ME5) and Clearcoat Bell (ME-8) paint spray booths. Condition 3 of February 12, 1999 NSR permit.

Particulate emissions from the four scuff booths to be controlled by panel filters. Condition 4 of the February 12, 1999 NSR permit.

Volatile Organic Compound (VOC) emissions from the Prime Bell (PS3), Main Enamel Basecoat Bell (ME3), Reciprocator (ME4), Robot (ME5) and Clearcoat Bell (ME8) shall be concentrated with carbon wheels and burned in the RTO's. Condition 5 of the February 12, 1999 NSR permit.

Volatile Organic Compound emissions from the use of cleaning solvents will be controlled by work practices, in such areas as applicator cleaning, booth cleaning and general paint area cleaning. Condition 6 of the February 12, 1999 NSR permit.

VOC emissions from the Primecoat (E-coat) operation are limited to 24.4 lbs/hour and 53.8 tons per year. Condition 7 of the February 12, 1999 NSR permit.

VOC emissions from the Guidecoat (antichip + primer) operation are limited to 62.7 lbs/hour and 138.5 tons per year. Condition 8 of the February 12, 1999 NSR permit.

VOC emissions from the Topcoat (basecoat + clearcoat + solid enamel) operation are limited to 916.3 lbs/hour and 877.9 tons per year. Condition 9 of the February 12, 1999 NSR permit.

VOC emissions from the Sealer operation are limited to 2.4 lbs/hour and 2.0 tons per year. Condition 10 of the February 12, 1999 NSR permit.

VOC emissions from the Final Repair operation are limited to 6.7 lbs/hour and 6.4 tons per year. Condition 11 of the February 12, 1999 NSR permit.

VOC emissions from the Purge/Cleaning Solvent operation are limited to 152.6 lbs/hour and 180.5 tons per year. Condition 12 of the February 12, 1999 NSR permit.

Facility emissions, due to all processes except fuel burning are limited to:

Total Suspended Particulate	10.8 lbs/hour	26.6 tons/year
PM10	10.8 lbs/hour	26.6 tons/year
Volatile Organic Compounds	1165.1 lbs/hour	1259.1 tons/year

Condition 13 of the February 12, 1999 NSR permit.

VOC emissions in tons per year shall be calculated monthly as the sum of each consecutive 12 month period for the E-coat, Guidecoat, Topcoat, Sealer, Final Repair and Purge/Cleaning operations. Condition 14 of the February 12, 1999 NSR permit.

Visible emissions from the panel filters and scrubber systems limited to 5% and 10%. Condition 15 of the February 12, 1999 NSR permit.

Ford shall install, calibrate and maintain a temperature measurement device in each incinerator and continuously record the temperature while the unit is in operation. Condition 19 of the February 12, 1999 NSR permit.

Periodic Monitoring

Calculations of 'G' shall be done each month as a performance test, in accordance with NSPS Subpart MM to determine the kg of VOC used per liter of applied solids. Condition 16 of the February 12, 1999 NSR permit.

Calculations of 'N' for each coating operation controlled by an incinerator shall be done each month in accordance with NSPS Subpart MM to determine the kg of VOC per liter of applied solids – emitted after the incinerator. Condition 17 of the February 12, 1999 NSR permit.

Visible emissions from the panel filters and scrubber systems shall be monitored for compliance with permit conditions.

The expected emissions from the facility coating operations (booth sections which are not controlled by carbon wheels and thermal oxidizers are exactly equal to the VOC content of the materials throughputs, both on an hourly basis and yearly basis. The 2005 annual emission update is attached for reference and contains the amounts of criteria and HAP pollutants that were emitted for calendar year 2005.

Reporting
Quarterly reports shall be submitted in accordance with 40 CFR 60.7 and NSPS Subpart MM, describing each violation of the following limits:

< The volume weighted monthly average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for prime coat operations,
< The volume weighted monthly average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for guide coat operations, and
< The volume weighted monthly average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for topcoat operations.

Condition 18 of the February 12, 1999 NSR permit.

Ford shall continuously record the incinerator temperature, during coating operations, in accordance with 40 CFR 60.7 and NSPS Subpart MM and submit written quarterly reports of any temperature excursions. Negative reports are also required to be submitted in case there are no temperature excursions. Condition 20 of the February 12, 1999 NSR permit.

Recordkeeping
The permittee shall retain records of all emission data and operating parameters required to demonstrate compliance with the VOC emission limits in the permit. Records shall conform to the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (December 1988). Condition 21 of the February 12, 1999 NSR permit.

The permittee shall maintain records of all emission data and operating parameters to show compliance with the permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. Condition 22 of the February 12, 1999 NSR permit.

Testing
The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The permittee shall allow authorized local, state and federal representatives upon presentation of credentials, to sample or test at reasonable times. Condition 24 of the February 12, 1999 NSR permit.

Streamlined Requirements
The permit does contain a streamlined condition at IV.A.11 where the applicable Condition #13 from the February 12, 1999 NSR permit has had all of the HAP limits removed, now that the facility is subject to a MACT, Subpart IIII.

GENERAL CONDITIONS
The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

STATE ONLY APPLICABLE REQUIREMENTS
The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

< 9 VAC 5 Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions (Rule 5-2),

< 9 VAC 5 Chapter 50, Part II, Article 3: Standards of Performance for Toxics Pollutants (Rule 5-3).

FUTURE APPLICABLE REQUIREMENTS
This facility is a major source of criteria pollutants and Hazardous Air Pollutants. The NSPS for Coating of Automobiles and Light-Duty Trucks, Subpart MM applies and the facility is currently in compliance with these requirements. The EPA has promulgated a MACT at 40 CFR 63, Subpart IIII for this source category and the compliance date is April 26, 2007.

INAPPLICABLE REQUIREMENTS
Currently inapplicable requirements identified by the applicant include the following:

< 9 VAC 5-50-80, Visible emissions are negligible for units BS1, SA1, SV1 and WA1.
< 9 VAC 5-30 et al, Ambient air quality standards
< 9 VAC 5-40-130 to 150, Emissions standards for odor
< 9 VAC 5-40-160 to 230, Emission standards for toxic pollutants: existing sources
< 9 VAC 5-40-240 to 280, 290 to 300, 320 to 330, 360 to 420, Emission standards for general process operations.
< 9 VAC 5-40-430 to 3400, 3560 to 5120, 5350 to 5641, Emission standards "Certain Source Categories".
< 9 VAC 5-40-3410 to 3550, Emission standards for VOC storage and transfer operations.
< 9 VAC 5-50-130 to 150, Standards for odor: new and modified sources.
< 9 VAC 5-50-160 to 230, Standards for toxics: new and modified sources.
< 9 VAC 5-50-280, 290, 300, 310, 320, Standards of performance, PSD
< 9 VAC 5-50-400 to 420, Standards of performance for new stationary sources.
< 9 VAC 5-50-430 to 600, Standards of performance for medical waste incinerators.
< 9 VAC 5-60 et al, NESHAP for existing, new and modified sources.
< 9 VAC 5-80-1710 to1970, PSD permits for stationary sources.
< 9 VAC 5-80-360, Acid rain operating permits.
< 9 VAC 5-500-10, Exclusionary general permit.
< 40 CFR 50, National primary and secondary ambient air quality standards.
< 40 CFR 52.21, PSD.
< 40 CFR 61, NESHAP for radon, vinyl chloride mercury, etc.

COMPLIANCE PLAN
This source does not have the requirement of a compliance plan.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission U No.	Emission Unit Descrip	Citation	Pollutant(s) Emitted (9 V 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I-SH1	Building space heate natural gas emissior	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	less than 10 mmBtu/Ho
I-SO1	Sealer oven natural g emissions	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	6.0 mmBtu/Hour
I-HW1	Paint shop water heat	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	less than 10 mmBtu/Ho
I-AB1	Abatement boiler	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	8.4 mmBtu/Hour
I-AC1	Air conditioning fil	9 VAC5-80-720	N/A	N/A
I-KS1	Kolene skid treatment, removal system	9 VAC5-80-720	VOC, TSP, PM10	N/A
I-SG1	Body shop sanding a grinding	9 VAC5-80-720	TSP, PM10, HAP's	N/A
I-OT1	Engine oil top-off	9 VAC5-80-720	VOC	N/A
I-PD1	Phosphate dip/rins	9 VAC5-80-720	VOC, TSP PM10	N/A
I-BF1	Brake fluid fill	9 VAC5-80-720	VOC	N/A
I-PS1	Power steering fluid	9 VAC5-80-720	VOC	N/A
I-CL1	Chassis line lubrican	9 VAC5-80-720	VOC	N/A
I-CF1	Coolant fill	9 VAC5-80-720	VOC, HAP's	N/A
I-SR1	Spot repair area	9 VAC5-80-720	VOC, HAP's, PM10, TS	N/A
I-CC1	Cold cleaners	9 VAC5-80-720	VOC	N/A
I-TF1	Transmission fluid f	9 VAC5-80-720	VOC	N/A
I-EL1	Engine line lubrican	9 VAC5-80-720	VOC	N/A
I-WF1	Washer fluid fill	9 VAC5-80-720	VOC, HAP's	N/A
I-GF1	Gasoline fill	9 VAC5-80-720	VOC, HAP's	N/A
I-BT1	Brake fluid storage ta	9 VAC5-80-720	VOC	N/A
I-AT1	Antifreeze tank	9 VAC5-80-720	VOC, HAP's	N/A
I-AT2	50% antifreeze tank	9 VAC5-80-720	VOC, HAP's	N/A
I-PT1	Power steering fluid Tar	9 VAC5-80-720	VOC	N/A
I-PT2	Power steering fluid Tar	9 VAC5-80-720	VOC	N/A
I-ER1	E-coat resin Tank #	9 VAC5-80-720	VOC, HAP's	N/A
I-ER2	E-coat resin Tank #	9 VAC5-80-720	VOC, HAP's	N/A
I-CT1	50% caustic Tank #	9 VAC5-80-720	No regulated pollutan	N/A
I-CT2	50% caustic Tank #	9 VAC5-80-720	No regulated pollutan	N/A
I-HW1	Hazardous Waste stor tank	9 VAC5-80-720	VOC, HAP's	N/A
I-KT1	Koliquid No. 5 tank	9 VAC5-80-720	Negligible	N/A
I-RT1	134a tank	9 VAC5-80-720	None	N/A
I-FC1	Dilute ferric chloride t	9 VAC5-80-720	Negligible	N/A
I-SA1	Sulfuric acid Tank #	9 VAC5-80-720	Negligible	N/A
I-SA2	Sulfuric acid Tank #	9 VAC5-80-720	Negligible	N/A
I-ET1	E-coat transfer	9 VAC5-80-720	VOC, HAP's	N/A

	Tank #1			
I-ET2	E-coat transfer Tank #2	9 VAC5-80-720	VOC, HAP's	N/A
I-ET3	E-coat transfer Tank #3	9 VAC5-80-720	VOC, HAP's	N/A
I-PT1	Propane tank	9 VAC5-80-720	VOC	N/A
I-MT1	Methanol storage tar	9 VAC5-80-720	VOC, HAP's	N/A
I-SS1	Spent solvent tank	9 VAC5-80-720	VOC, HAP's	N/A
I-SP1	Spent purge tank	9 VAC5-80-720	VOC, HAP's	N/A
I-TH1	Paint thinner Tank #	9 VAC5-80-720	VOC, HAP's	N/A
I-TH2	Paint thinner Tank #	9 VAC5-80-720	VOC, HAP's	N/A
I-FP1	Fire Pump #1	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	N/A
I-FP2	Fire Pump #2	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	N/A
I-FP3	Fire Pump #3	9 VAC5-80-720	NO_x, CO, SO_2, VOC, PM10, HAP's	N/A
I-MW1	Maintenance weldin	9 VAC5-80-720	TSP, PM10, HAP's	N/A
I-CW1	Cavity wax applicati	9 VAC5-80-720	VOC	N/A
I-WW1	Wastewater treatmer	9 VAC5-80-720	VOC	N/A
I-GT1	Gasoline storage Tank	9 VAC5-80-720	VOC, HAP's	N/A
I-GT2	Gasoline storage Tank	9 VAC5-80-720	VOC, HAP's	N/A
I-DT1	Diesel storage Tank #	9 VAC5-80-720	VOC, HAP's	N/A
I-DT2	Diesel storage Tank #	9 VAC5-80-720	VOC, HAP's	N/A

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application.
9 VAC 5-80-720 B - Insignificant due to emission levels.
9 VAC 5-80-720 C - Insignificant due to size or production rate.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Virginian Pilot from February 4, 2007 to February 4, 2007. The proposed permit and the statement of basis will be available for viewing at the Tidewater Regional Office, 5636 Southern Blvd, Virginia Beach, VA. 23462. Comments will be received on the proposed permit for thirty days, ending March 6, 2007.